

**IN THE UNITED STATES
DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA**

**UNITED STATES OF
AMERICA**

V.

**CHRISTOPHER ULMER,
DEFENDANT**

CASE NUMBER

2:06-CR-00169-WKW-SRW

**MOTION TO ALLOW SUBSTITUTE
COUNSEL FOR PRETRIAL
CONFERENCE**

COMES NOW the defendant, Christopher Ulmer, by and through his counsel of record and pursuant to the Order of Arraignment moves this Honorable Court for an order allowing the substitution of counsel at the Pre-Trial conference currently set for September 28, 2007 by stating the following grounds:

1. The Defendant's counsel will be fulfilling his duties as a Trustee in Bankruptcy with scheduled §341 Meeting of Creditors set for September 28, 2007 beginning at 9:00 a.m.
2. The bankruptcy hearing dates have been pre-set and rescheduling will result in the notification to many debtors and far more creditors.
3. Counsel represents that after further negotiations with the Government, the Defendant will be entering a plea. If the Court finds it acceptable, defense counsel will send another attorney and personally discuss the matters normally covered at a Pre-Trial conference with the attorney for the Government.
4. The Defendant has no objections for the substitution of counsel for the Pre-Trial conference. (See Attached Affidavit)

WHEREFORE the above premises considered, the Defendant prays that this Honorable Court will allow defense counsel to designate another attorney from his office to represent the defendant during the Pre-Trial conference.

RESPECTFULLY SUBMITTED this the 24th day of August, 2007.

/s/ Daniel G. Hamm

DANIEL G. HAMM (HAM043)
ATTORNEY FOR THE DEFENDANT
DANIEL G. HAMM, P.C.
560 S. McDONOUGH ST., STE. A
MONTGOMERY, ALABAMA 36104
TELEPHONE 334-269-0269
FAX 334-323-5666

CERTIFICATE OF SERVICE

This is to certify that I have this day served a copy of this Motion to Allow Substitute Counsel for Pretrial Conference by electronic transmission or by placing a copy in the United States Mail with sufficient postage for first class delivery to the attorneys named below.

DONE this the 24th day of August, 2007.

/s/ Daniel G. Hamm

DANIEL G. HAMM (HAM043)
ATTORNEY FOR THE DEFENDANT
DANIEL G. HAMM, P.C.
560 S. McDONOUGH ST., STE. A
MONTGOMERY, ALABAMA 36104
TELEPHONE 334-269-0269
FAX 334-323-5666

A. Clark Morris
Assistant United States Attorney
Post Office Box 197
Montgomery, Alabama 36101